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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,  
Plaintiffs,

Civil No. 6:20-cv-01163-MK  
(Lead Case)

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINISTRATOR OF THE  
ESTATE OF DAVID E. HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY,

Defendants.

DECLARATION OF ANDREW C.  
LAUERSDORF IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ORDER  
TO SHOW CAUSE

VIDOCQ SOCIETY,  
Cross-Claimant,

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINISTRATOR OF THE  
ESTATE OF DAVID E. HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY  
Cross-Defendants.

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,  
Plaintiffs,

Civil Case No. 3:21-cv-01719-MK  
(Trailing Case)

v.

OREGON STATE POLICE,  
Defendant.

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I, Andrew C. Lauersdorf, declare as follows:

1. I am an attorney representing Plaintiffs in the above-captioned case. I have personal knowledge of the following facts gained in my capacity as counsel.
2. Attached at Exhibit 1 is a true and accurate copy of an email sent to all parties by counsel for the Oregon State Police Defendants on April 16, 2021.
3. Attached as Exhibit 2 are true and accurate copies of the first two and last two pages of documents produced in this action by Defendant City of Coquille as its initial document production on October 2, 2020, which was Bates numbered Coquille 000001 through Coquille 010618. Plaintiffs believe that the attached documents were previously produced in discovery in

Mr. McGuffin's criminal and post-conviction trials, and are likely public record, but Plaintiffs have redacted the documents for purposes of respecting Defendant City of Coquille's "confidential" designation and complying with the Court's Stipulated Protective Order. The production also included electronic files Bates numbered Coquille 010619 through Coquille 010636. On July 5, 2023, Defendant City of Coquille produced an additional 364 pages of documents in discovery in this action, all of which included the same or similar "confidential – subject to protective order" stamp appearing on Exhibit 2.

4. Attached as Exhibit 3 is a true and accurate copy of excerpts from the transcript of the deposition of Plaintiff Nicholas McGuffin conducted on January 12-13, 2023.

5. Attached as Exhibit 4 is a true and accurate copy of excerpts from the transcript of the deposition of Plaintiff S.M. conducted on July 17, 2023.

6. Attached as Exhibit 5 is a true and accurate copy of email correspondence between counsel for the City-County Defendants and counsel for Plaintiffs on May 15, 2023, including the corresponding attachment.

7. Attached as Exhibit 6 is a true and accurate copy of email correspondence between counsel for the City-County Defendants and counsel for Plaintiffs on July 26, 2023.

8. On June 27, 2023, I interviewed Lisa Bartholomew at her home at 21226 Abiqua Road NE, in Scotts Mills, Oregon (97375), and confirmed that Ms. Bartholomew is not related by blood or marriage to any of the plaintiffs or defendants in the above-captioned action, has never resided in Coquille or Coos County, Oregon, has never resided in the same community or been employed in the same workplace as Plaintiff Nicholas McGuffin, and, at that time, did not possess any personal knowledge relevant to the above-captioned action other than information she had gleaned from the internet. Ms. Bartholomew informed me at that time that she was aware that her adult daughter, Georgia McGuffin, has a personal relationship with Mr. McGuffin, and Ms. Bartholomew is adamantly opposed to their relationship for reasons unrelated to the above-captioned action.

9. On or about August 24, 2023, I was informed and provided with corroborating evidence that Lisa Bartholomew had been supplied with detailed information that Plaintiffs had designated “confidential” pursuant to the parties’ stipulations and the Court’s Stipulated Protective Order, and that Ms. Bartholomew had in turn divulged that information to one or more persons who were not authorized to possess the information.

10. To date, Plaintiffs have not been provided with a copy of the Stipulated Protective Order signed by Lisa Bartholomew or any of her family members.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

EXECUTED September 19, 2023

/s/Andrew C. Lauersdorf  
Andrew C. Lauersdorf, OSB #980739  
E-Mail: [acl@mlrlegalteam.com](mailto:acl@mlrlegalteam.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2023, the foregoing DECLARATION OF ANDREW C. LAUERSDORF IN SUPPORT OF PLAINTIFFS' MOTION FOR ORDER TO SHOW CAUSE was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477 rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net <i>Attorneys for Defendants</i> <i>City of Coquille, City of Coos Bay, Coos</i> <i>County, Craig Zanni, Chris Webley, Eric</i> <i>Schwenninger, Sean Sanborn, Ray McNeely,</i> <i>Kris Karcher, Pat Downing, Mark Dannels,</i> <i>Kip Oswald, Michael Reaves, David Zavala,</i> <i>Anthony Wetmore, Shelly McInnes</i>	Jesse B. Davis Todd Marshall Oregon Department of Justice 100 SW Market Street Portland, OR 97201 todd.marshall@doj.state.or.us jesse.b.davis@doj.state.or.us <i>Attorneys for Defendants Oregon State</i> <i>Police, John Riddle, Susan Hormann,</i> <i>Mary Krings, Kathy Wilcox</i>
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☒ by electronic means through the Court's ECF System on the date set forth above.

MALONEY LAUERSDORF REINER PC

By /s/ Andrew C. Lauersdorf  
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